

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CAMOFI Master LDC,

Plaintiff,

against

Global Axxess Corp,

Defendant.

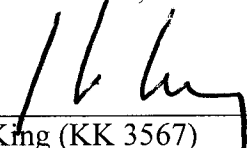
NO. 07 CV 9317 (HB)

**NOTICE OF MOTION FOR
ADMISSION OF M. DUNCAN
GRANT *PRO HAC VICE***

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Kenneth J. King, executed on November 30, 2007, and the exhibits annexed thereto, defendant Global Axxess Corp will move this Court, before the Honorable Harold Baer, Jr., United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date and at such time as may be set by the Court, for an Order granting M. Duncan Grant admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Global Axxess Corp, pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York.

Dated: New York New York
November 30, 2007

Respectfully submitted,


Kenneth J. King (KK 3567)
Suzanne M. D'Amico (SD 3581)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue, 37th Floor
New York, NY 10018-1405
(212) 808-2700

Attorneys for Defendant
Global Axxess Corp

90925-634795

U.S. DISTRICT COURT
NOV 30 2007
SD-3

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CAMOFI Master LDC,	:	
	:	
Plaintiff,	:	NO. 07 CV 9317 (HB)
	:	
against	:	
	:	MOTION FOR ADMISSION OF
	:	M. DUNCAN GRANT <i>PRO HAC</i>
Global Axxess Corp,	:	<i>VICE</i>
	:	
Defendant.	:	

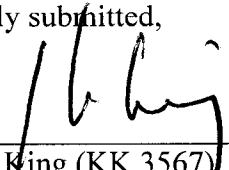
Pursuant to Local Rule 1.3(c), I, Kenneth J. King, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

M. Duncan Grant
Pepper Hamilton LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103
(215) 981-4000
grantm@pepperlaw.com

M. Duncan Grant is a member in good standing of the Bars of the Commonwealth of Pennsylvania and of the State of Delaware. There are no pending disciplinary proceedings against him in any State or Federal Court.

Dated: New York New York
November 30, 2007

Respectfully submitted,



Kenneth J. King (KK 3567)
Suzanne M. D'Amico (SD 3581)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue, 37th Floor
New York, NY 10018-1405
(212) 808-2700

Attorneys for Defendant
Global Axxess Corp

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CAMOFI Master LDC,	:	
Plaintiff,	:	NO. 07 CV 9317 (HB)
against	:	AFFIDAVIT IN SUPPORT OF
Global Axxess Corp,	:	NOTICE OF MOTION FOR
Defendant.	:	ADMISSION OF M. DUNCAN
	:	GRANT <i>PRO HAC VICE</i>

Kenneth J. King, Esquire, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and a partner with Pepper Hamilton LLP, counsel for Defendant Global Axxess Corp (“Global Axxess”) in this action. I submit this affidavit in support of Global Axxess’ application for an order granting M. Duncan Grant *pro hac vice* admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Global Axxess, pursuant to Local Civil Rule 1.3(c).

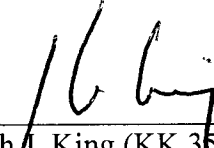
2. M. Duncan Grant is a partner with Pepper Hamilton LLP. He is admitted to practice before the courts of Pennsylvania and Delaware. He has been and is a member in good standing of the Bars of the Commonwealth of Pennsylvania and of the State of Delaware. His Certificate of Good Standing in the Bar of the Commonwealth of Pennsylvania is annexed hereto as Exhibit A. His Certificate of Good Standing in the Bar of the State of Delaware is annexed hereto as Exhibit B.

3. Pursuant to Local Civil Rule 1.3(c), I request that M. Duncan Grant be permitted to argue and try the above-captioned case.

4. Attached as Exhibit C is a proposed Order granting this motion.

5. There has been no prior application in this case for the *pro hac vice* admission of M. Duncan Grant.

WHEREFORE, it is respectfully requested that this Court grant M. Duncan Grant *pro hac vice* admission to the bar of this Court for the purpose of arguing and trying this case on behalf of defendant Global Axxess Corp.



Kenneth J. King (KK 3567)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue, 37th Floor
New York, NY 10018-1405
(212) 808-2700

Sworn to before me this
30th day of November, 2007.



Notary Public

SUZANNE DAMICO
Notary Public, State of New York
No. 02DA6176635
Qualified in New York County
Commission Expires Nov. 5, 2011



Supreme Court of Pennsylvania

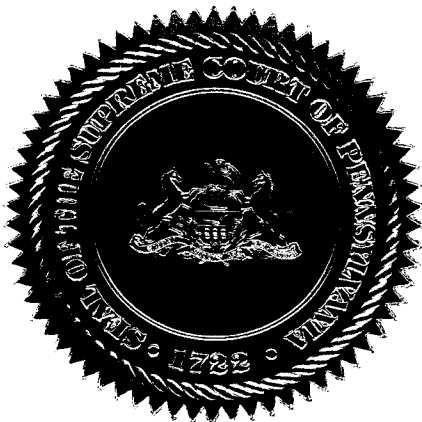
CERTIFICATE OF GOOD STANDING

M. Duncan Grant, Esq.

DATE OF ADMISSION

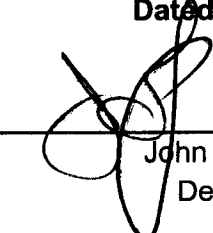
October 28, 1975

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 8, 2007



John W. Person, Jr., Esq.
Deputy Prothonotary

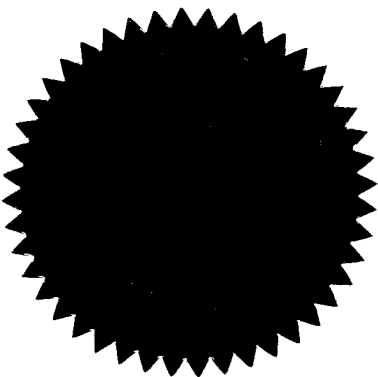
SUPREME COURT OF THE STATE OF DELAWARE

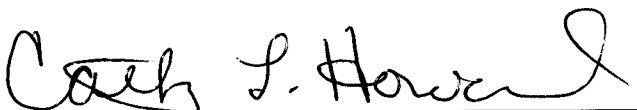
CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **M. Duncan Grant** was admitted to practice as an attorney in the Courts of this State on **December 12, 1991** and is an **active** member of the Bar of the Supreme Court of the State of Delaware in good standing.

IN TESTIMONY WHEREOF,

I have hereunto set my hand and affixed the seal of said Court at Dover this 6th day of November 2007.





Cathy L. Howard
Clerk of the Supreme Court

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CAMOFI Master LDC,	:	
	:	
Plaintiff,	:	NO. 07 CV 9317 (HB)
	:	
against	:	ORDER FOR ADMISSION OF
	:	M. DUNCAN GRANT <i>PRO HAC</i>
Global Axxess Corp,	:	<i>VICE</i>
	:	
Defendant.	:	

ORDER

IT IS HEREBY ORDERED, this ____ day of _____, 2007, upon the motion of Defendant Global Axxess Corp ("Global Axxess") for an Order pursuant to Local Civil Rule 1.3(c) granting *pro hac vice* admission to M. Duncan Grant in connection with the above-captioned case, and upon consideration of the motion and the affidavit in support thereof, it is ORDERED that

M. Duncan Grant
Pepper Hamilton LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103
(215) 981-4000
grantm@pepperlaw.com

is granted *pro hac vice* admission to the bar of this Court for the purpose of participating in, arguing and trying this action on behalf of defendant Global Axxess Corp. If counsel does not already have an ECF password, he shall promptly apply for one at nysd.uscourts.gov.

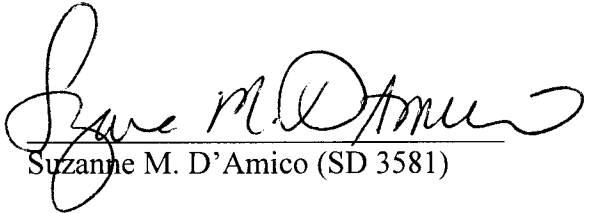
Dated: New York, New York
_____, 2007

Harold Baer, Jr.
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2007, the foregoing Notice of Motion for Admission of M. Duncan Grant *Pro Hac Vice*, Motion, supporting Affidavit, and proposed Order was mailed to the following counsel:

Joseph Thomas Johnson, III
Eaton & Van Winkle, LLP
Three Park Avenue
16th Floor
New York, NY 10016


Suzanne M. D'Amico (SD 3581)